

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE
PLACEMENT CONSUMER PRIVACY
LITIGATION

C.A. 12-MD-2358 (SLR)

This Document Relates to:
All Actions

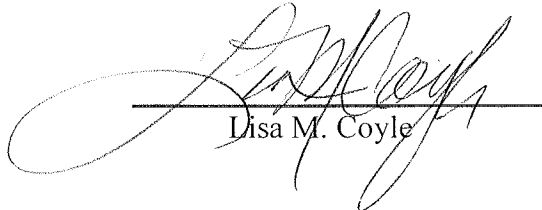
DECLARATION OF LISA M. COYLE

I, Lisa M. Coyle, submit this declaration in support of the motion to dismiss, for failure to state a claim, the claims asserted against defendants Media Innovation Group, LLP and WPP plc (together, the "Moving Defendants") in the consolidated class action complaint, and hereby state as follows:

1. I am an attorney admitted to practice in the State of New York and admitted to this Court *pro hac vice* in the above captioned action.
2. I am an associate at Ropes & Gray, LLP, counsel to the Moving Defendants.
3. Attached to this declaration as Exhibit A is a true and correct printed copy of Stanford researcher Jonathan Meyer's Web Policy blog entry entitled "Safari Trackers" dated February 17, 2012, accessible at <http://webpolicy.org/2012/02/17/safari-trackers/>.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 1st day of May 2013



Lisa M. Coyle

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on May 1, 2013, upon the following in the manner indicated:

Stephen G. Grygiel, Esquire
KEEFE BARTELS
170 Monmouth Street
Red Bank, NJ 07701
*Interim Lead Counsel for the Putative Plaintiff
Class*

VIA ELECTRONIC MAIL

Brian Russell Strange, Esquire
STRANGE & CARPENTER
12100 Wilshire Boulevard, Suite 1900
Los Angeles, CA 90025
*Interim Lead Counsel for the Putative Plaintiff
Class*

VIA ELECTRONIC MAIL

James Frickleton, Esquire
BARTIMUS, FRICKLETON, ROBERTSON
& GORNY-LEAWOOD
11150 Overbrook Road, Suite 200
Leawood, KS 66211
*Interim Lead Counsel for the Putative Plaintiff
Class*

VIA ELECTRONIC MAIL

Seth D. Rigrodsky, Esquire
Brian D. Long, Esquire
Gina M. Serra, Esquire
RIGRODSKY & LONG, P.A.
2 Righter Parkway, Suite 120
Wilmington, DE 19801
*Council for Proposed Intervening Plaintiffs
Daniel Mazzone, Michelle Kuswanto, Michael
Frohberg and Andy Wu*

VIA ELECTRONIC MAIL

Kim E. Richman, Esquire
Michael R. Reese, Esquire
George Granade, Esquire
REESE RICHMAN LLP
875 Avenue of the Americas, 18th Floor
New York, NY 10001
Council for Proposed Intervening Plaintiffs
Daniel Mazzone, Michelle Kuswanto, Michael
Frohberg and Andy Wu

VIA ELECTRONIC MAIL

Sanford P. Dumain, Esquire
Adam Bobkin, Esquire
Melissa Clark, Esquire
Leigh Smith, Esquire
MILBERG LLP
One Penn Plaza
New York, NY 10119
Council for Proposed Intervening Plaintiffs
Daniel Mazzone, Michelle Kuswanto, Michael
Frohberg and Andy Wu

VIA ELECTRONIC MAIL

David Azar, Esquire
MILBERG LLP
300 South Grand Avenue, Suite 3900
Los Angeles, CA 90071
Council for Proposed Intervening Plaintiffs
Daniel Mazzone, Michelle Kuswanto, Michael
Frohberg and Andy Wu

VIA ELECTRONIC MAIL

Kelly E. Farnan, Esquire
Rudolf Koch, Esquire
Travis S. Hunter, Esquire
RICHARDS, LAYTON & FINGER P.A.
920 North King Street
Wilmington, Delaware 19801
Attorneys for Defendant Vibrant Media Inc.

VIA ELECTRONIC MAIL

Edward P. Boyle, Esquire
David N. Cinotti, Esquire
Joeann E. Walker, Esquire
VENABLE LLP
1270 Avenue of the Americas, 24th Floor
New York, NY 10020
Attorneys for Defendant Vibrant Media Inc.

VIA ELECTRONIC MAIL

Anthony J. Weibell, Esquire
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, CA 94304-1050
Attorneys for Defendant Google Inc.

VIA ELECTRONIC MAIL

Carol Lynn Thompson, Esquire
SIDLEY AUSTIN LLP
555 California Street, 20th Floor
San Francisco, CA 94104
Attorneys for Defendant Pointroll Inc.

VIA ELECTRONIC MAIL

/s/ Regina S.E. Murphy

Regina S.E. Murphy (#5648)